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Attorneys for Defendant
GOOGLE LLC

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

DREAMSTIME.COM, LLC, a Florida LLC,)	CASE NO.: 3:18-CV-01910-WHA
)	
Plaintiff,)	DECLARATION OF LAUREN
)	GALLO WHITE IN SUPPORT OF
v.)	DEFENDANT GOOGLE LLC'S
)	BILL OF COSTS PURSUANT TO
GOOGLE LLC, a Delaware LLC; and)	FED. R. CIV. P. 54(d)(1) AND
DOES 1-10,)	LOCAL RULE 54-1
)	
Defendants.)	

Judge: Hon. William H. Alsup

I, Lauren Gallo White, declare:

1. I am an attorney at the law firm of Wilson, Sonsini, Goodrich & Rosati, counsel for Defendant Google LLC (“Google”), and duly admitted to practice before this Court. I submit this Declaration in support of Google’s Bill of Costs. I am over the age of 18 and competent to make this declaration. I make each of the following statements based on my personal knowledge, and I could, if necessary, testify to the truth of each of them.

2. On July 3, 2020, the Court entered final judgment in Google’s favor. Dkt. 185. Pursuant to Fed. R. Civ. P. 54(d)(1) and Local Rule 54-1, Google submits its Bill of Costs itemizing each category of costs that are recoverable pursuant to those rules and 28 U.S.C. § 1821.

3. I have been counsel for Google throughout this matter, and in a position to observe the conduct of the case by Google, including the costs it incurred in connection with the case. Given that role, I verify that, to the best of my knowledge and belief, all costs included in Google’s Bill of Costs are correct and were necessarily incurred in this action. I also verify to the best of my knowledge that the services generating the costs included in Google’s Bill of Costs were actually performed and are allowable by law.

4. Attached hereto as **Exhibit A** are true and correct copies of documentation for the filing and docket fees that Google reasonably incurred in this action, in the amount of \$2,417.65, and that are recoverable pursuant to Local Rule 54-3(a)(1). Those costs are itemized below:

Date	Description	Amount
04/04/18	Pro Hac Admission Fee	\$310.00
04/06/18	Pro Hac Admission Fee	\$310.00
10/19/18	Pro Hac Admission Fee	\$310.00
03/31/19	Document Filing Fee	\$105.00
09/09/19	Service of Process	\$385.00
10/04/19	Service of Process	\$377.65
01/03/20	Pro Hac Admission Fee	\$310.00

01/03/20	Pro Hac Admission Fee	\$310.00
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5. Attached hereto as **Exhibit B** are true and correct copies of documentation for reporters' transcript fees that Google reasonably incurred in this action, in the amount of \$369.90, and that are recoverable pursuant to Local Rule 54-3(b)(1) and (b)(2). Those costs are itemized below:

Date	Description	Amount
09/18/18	Transcript for hearing 09/06/2018	\$48.60
12/18/18	Transcript for hearing 12/31/2018	\$150.35
06/17/19	Transcript for hearing 05/30/2019	\$59.50
09/11/19	Transcript for hearing 09/09/2019	\$47.70
12/02/19	Transcript for hearing 11/27/2019	\$30.45
06/22/20	Transcript for hearing 06/18/20	\$33.30

6. Plaintiff sought and was granted leave to exceed the minimum number of 10 depositions provided for in Fed. R. Civ. P. 30 (*see* Dkt. 114 at 13) and proceeded to take depositions of 16 individuals. Attached hereto as **Exhibit C** are true and correct copies of documentation for deposition transcript/video and exhibit fees that Google reasonably incurred in this action, in the amount of \$112,902.57, and that are recoverable pursuant to Local Rule 54-3(c)(1) and (c)(3). Those costs are itemized below:

Date	Description	Amount
01/31/20	Capilouto, Joshua - deposition transcript	\$1,864.85
01/24/20	Capilouto, Joshua - deposition transcript (PMK)	\$328.30

1	01/31/20	Capilouto, Joshua - deposition video	\$545.00
2			
3	05/08/20	Hall, David - deposition transcript	\$1,860.80
4			
5	02/19/20	Illyes, Gary - deposition transcript	\$1,902.50
6			
7	02/20/20	Illyes, Gary - deposition video	\$458.22
8			
9	02/17/20	Lehman, Eric - deposition transcript	\$2,417.26
10			
11	02/17/20	Lehman, Eric - deposition transcript (confidential part)	\$1,235.52
12			
13	03/05/20	Lehman, Eric - deposition video	\$767.50
14			
15	03/23/20	Marian, Tudor - deposition transcript and video	\$2,614.80
16			
17	02/24/20	Moraru, Elisabeta - deposition transcript	\$2,728.15
18			
19	02/29/20	Moraru, Elisabeta - deposition video	\$720.72
20			
21	02/19/20	Mrndze, Josko - deposition transcript	\$840.30
22			
23	02/20/20	Mrndze, Josko - deposition video	\$305.00
24			
25	02/21/20	Mueller, John - deposition transcript	\$2,144.62
26			
27	02/24/20	Mueller, John - deposition video	\$598.22
28			
	02/12/20	Nil, Dale - deposition transcript 30(b)(6)	\$485.60
	02/12/20	Nil, Dale - deposition transcript	\$2,719.94
	03/05/20	Nil, Dale - deposition video	\$760.00

02/17/20	Pavliuk, Olga - deposition transcript	\$1,980.20
02/24/20	Pavliuk, Olga - deposition video	\$602.50
02/27/20	Punga, Carmen - deposition transcript	\$3,154.80
02/27/20	Punga, Carmen - deposition video	\$777.50
02/14/20	Simulescu, Andreea - deposition transcript	\$2,376.95
03/03/20	Spies, Francois - deposition transcript	\$446.01
03/05/20	Spies, Francois - deposition video	\$175.00
03/11/20	Stroe, Maria - deposition transcript	\$946.10

In addition, Exhibit C includes an internal record of Google's expenditures for deposition-related contract services from its vendor Veritext, in connection with the depositions of Dreamstime's witnesses.

7. Attached hereto as **Exhibit D** is a true and correct copy of documentation for disclosure/formal document discovery fees that Google reasonably incurred in this action and that are recoverable pursuant to Local Rule 54-3(d)(2). The total costs are \$3,606.51. The attached Exhibit D includes an internal record of Google's expenditures for discovery-related contract services from its vendor OpenText. The exhibit does not include costs that Google incurred in hosting documents, producing copies for counsel's use, technical support, or actual review of documents.

8. Attached hereto as **Exhibit E** are true and correct copies of documentation for witness travel fees that Google reasonably incurred in this action and that are recoverable pursuant to Local Rule 54-3(e) and 28 U.S.C. § 1821. Several witnesses listed in the accompanying worksheet traveled to California from a foreign country, and Google is therefore

1 seeking two days of attendance and subsistence fees for several of these witnesses, at the rates
2 allowed by 28 U.S.C. §§ 1821(b) and (d). In addition, those witnesses traveled to California by
3 use of a common carrier, and documentation supporting a portion of Google's travel costs are
4 included in Exhibit E. *See* 28 U.S.C. § 1821(c)(1). All foreign currency costs have been
5 converted into United States currency using the exchange rate at the time of purchase, and
6 redactions have been made to the documentation to protect the witnesses' private financial and
7 personal information.

8 I declare under penalty of perjury under the laws of the State of California and the United
9 States that the foregoing is true and correct and that this Declaration is executed the 17th day of
10 July, 2020, in San Francisco, California.

11 /s/ Lauren Gallo White
12 Lauren Gallo White
13 lwhite@wsgr.com
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